

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL NO. 09-10243-MLW  
 )  
 RYAN HARRIS )

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(A)

The United States of America and defendant Ryan Harris hereby submit this status memorandum addressing the issues set forth in Local Rule 116.5(A)(1) through (A)(7).

(A) (1)

The government has produced discovery by letters dated January 10, 2010, April 22, 2010 (Bates #s 328-753), and April 26, 2010 (Bates #s 754-1690). In view of the volume of discovery to date, and additional discovery that is expected, defendant seeks relief from the timing requirements of Local Rule 116.3 and asks for an additional four weeks to file discovery letters.

(A) (2)

The Court has already set expert disclosure deadlines, for the government eight weeks before trial, and for the defendant, four weeks before trial.

(A) (3)

The parties at this time are uncertain whether additional discovery will be needed as a result of future receipt of information, documents, or reports of examinations or tests.

(A) (4)

Defendant seeks a period of 50 days to file pretrial motions. The parties submit that a motion date should be set after the government has had an appropriate time to respond.

(A) (5)

The periods from the initial appearance (December 17, 2009) to December 31, 2009, and from December 31, 2009 to the present date, have been ordered excluded under the Speedy Trial Act to permit defendant to obtain and review discovery material and in the interest of justice. The further period from the date of this conference through the date of the further conference should be excluded.

(A) (6)

The government estimates that its case will take 15 trial days.

(A) (7)

The parties suggest that the Court schedule a further interim status conference.

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By his attorney,

By: /s/ Adam J. Bookbinder

/s/ Charles P. McGinty

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February 22, 2010